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November 2, 2021

VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: ***Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP**
Deadline To Respond to ECF Nos. 366 and 367

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre to respectfully request that Plaintiff have until Wednesday, December 15, 2021, to respond to Defendant's letters requesting certification under 28 U.S.C. 1292(b) and requesting leave to move to strike. ECF Nos. 366 and 367. In support of this request, I note that Plaintiff's legal team currently has pressing professional obligations, both on this case and on others. These include opposing four motions to dismiss in another action with a briefing deadline of December 13.

Plaintiff's response to Defendant's request for certification is due on December 8, ECF No. 368, and her response to Defendant's request to move to strike is due on December 6, Individual Practices Rule 2.A. Plaintiff has not previously requested an extension of time to respond to either. Defendant supports this request on the condition that Plaintiff request that his reply deadline be December 22. Plaintiff so requests.

Respectfully,

/s/ Charles J. Cooper
Charles J. Cooper

cc: Counsel of Record

SO ORDERED.

 12/02/2021